## 1 HONORABLE DAVID. G. ESTUDILLO 2 3 UNITED STATES DISTRICT COURT 4 WESTERN DISTRICT OF WASHINGTON AT TACOMA 5 JANICE HENNESSEY, Case No. 3:24-cv-05145-DGE 6 Plaintiff, STIPULATED MOTION AND ORDER TO 7 EXTEND TIME TO REPLY TO **DEFENDANTS' RESPONSE TO MOTION** VS. 8 FOR RELIEF AND CONTINUE MOTION AMERICREDIT FINANCIAL SERVICES 9 INC. DBA GM FINANCIAL, HOBLIT **NOTE ON MOTION CALENDAR:** AUTOMOTIVE, INC. DBA HOBLIT 10 CHEVROLET BUICK GMC, **OCTOBER 22, 2024** 11 12 13 Defendants. 14 STIPULATED MOTION 15 COME NOW, the parties, by and through their counsel of record, and submit the 16 following stipulated motion and proposed order to extend the time for Plaintiff to file a Reply 17 to Defendants' Joint Response to Plaintiff's Motion for Relief from Order and Judgement & 18 Request for Indicative Ruling Under Rule 62.1(A) (DKT. #54). This Motion is noted for 19 October 28, 2024, making the current deadline for the Plaintiff to file a Reply by the same 20 date of October 28, 2024. The parties stipulate and request the deadline to be extended 14 21 days to November 11, 2024. The grounds for this motion are as follows: 22 Due to unexpected health matters and worsened illness/infection, Plaintiff requires an 23 24 Janice Hennessey, Pro Se Plaintiff STIPULATED MOTION AND ORDER TO 25 855 Trosper Road SW, #108-157 EXTEND TIME TO REPLY TO Tumwater, WA 98512 DEFENDANTS' RESPONSE TO MOTION Tel. 415-676-8711 FOR RELIEF – NOTE ON MOTION Email: janicehennessey2015@gmail.com CALENDAR - OCTOBER 15, 2024 - 1

1 additional 14 days to recover from her worsened medical condition and properly prepare her 2 reply. The parties have conferred, Plaintiff provided a medical record, and the Defendants 3 have graciously agreed to the stipulated request for the extension. Plaintiff proposes to extend 4 her deadline to November 11, 2024, with the motion being noted on the same date. Plaintiff 5 also agrees to limit her reply brief to 2,100 words, pursuant to LCR 7(e)(4). 6 Pursuant to Local Civil Rule 7(j), the Court may, for good cause, extend the deadlines for 7 filings. Plaintiff's request is based on medical/health issues, which have limited her ability to 8 meet the original filing deadline. Defendants have agreed to the extension, and no party will 9 be prejudiced by this short delay. 10 For the reasons set forth above, Plaintiff respectfully requests that the Court approve this 11 stipulated motion and issue an order extending the deadline for Plaintiff's Reply to November 12 13 11, 2024, and noting the motion for the same date. 14 IT IS SO STIPULATED this 22nd day of October, 2024. 15 By: s/Janice Hennnessey By: s/Binah B. Yeung JANICE HENNESSEY, Pro Se Litigant BINAH B. YEUNG, WSBA #44065 16 Email: janicehennessey2015@gmail.com Attorney for Defendant GM Financial 17 524 2<sup>nd</sup> Avenue, Ste. 500 855 Trosper Road SW, #108-157 Tumwater, WA 98512 Seattle, WA 98104-2323 18 Telephone: 415-676-8711 Phone: 206-587-0700 Email: byeung@cairncross.com 19 By: s/Megan M. Coluccio 20 MEGAN M. COLUCCIO, WSBA #44178 ROBERT L. CHRISTIE, WSBA #44178 21 Attorneys for Hoblit Automotive, Inc. 22 2100 Westlake Avenue N. Suite 206 Seattle, WA 98109 23 Phone: 206-957-9669 24 Fax: 206- 352-7875 Janice Hennessey, Pro Se Plaintiff STIPULATED MOTION AND ORDER TO 25 855 Trosper Road SW, #108-157 EXTEND TIME TO REPLY TO Tumwater, WA 98512 DEFENDANTS' RESPONSE TO MOTION Tel. 415-676-8711 FOR RELIEF - NOTE ON MOTION

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1 Email: megan.coluccio@bakersterchi.com Email: bob.christie@bakersterchi.com 2 I certify that this memorandum contains 287 3 words, in compliance with the Local Rules Civil Rules. 4 5 **ORDER** 6 Based upon the foregoing Stipulation, 7 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for the 8 Plaintiff to file a Reply to Defendants' Joint Response to Plaintiff's Motion for Relief from 9 Order and Judgement & Request for Indicative Ruling Under Rule 62.1 (A) is extended until 10 and including November 11, 2024. 11 12 DONE IN OPEN COURT this 23rd day of October 2024. 13 14 15 HONORABLE DAVID G. ESTUDILLO United States District Court Judge 16 Presented By: 17 18 By: s/Janice Hennnessey By: s/Binah B. Yeung 19 JANICE HENNESSEY, Pro Se Litigant BINAH B. YEUNG, WSBA #44065 Email: janicehennessey2015@gmail.com Attorney for Defendant GM Financial 20 524 2<sup>nd</sup> Avenue, Ste. 500 855 Trosper Road SW, #108-157 Tumwater, WA 98512 Seattle, WA 98104-2323 21 Telephone: 415-676-8711 Phone: 206-587-0700 22 Email: byeung@cairncross.com By: <u>s/Megan M. Coluccio</u> 23 MEGAN M. COLUCCIO, WSBA #44178 24 Janice Hennessey, Pro Se Plaintiff STIPULATED MOTION AND ORDER TO 25 855 Trosper Road SW, #108-157 EXTEND TIME TO REPLY TO Tumwater, WA 98512 DEFENDANTS' RESPONSE TO MOTION Tel. 415-676-8711 FOR RELIEF - NOTE ON MOTION Email: janicehennessey2015@gmail.com CALENDAR - OCTOBER 15, 2024 - 3

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Janice Hennessey, Pro Se Plaintiff 855 Trosper Road SW, #108-157 Tumwater, WA 98512 Tel. 415-676-8711 Email: janicehennessey2015@gmail.com

## 1 **CERTIFICATE OF SERVICE** 2 I, Janice Hennessey, hereby certify that I caused a copy of the foregoing to be served 3 on the parties listed below, via the Court's CM/ECF System on October 22, 2024. 4 Binah Yeung byeung@cairncross.com Cairncross & Hempelmann, P.S. 5 524 Second Ave., Ste. 500 Seattle, WA 98104 6 main: 206-587-0700 7 fax: 206-587-2308 8 Attorney for Defendant AmeriCredit Financial Services dba GM Financial 9 Robert Christie bob.christie@bakersterchi.com Megan Coluccio megan.coluccio@bakersterchi.com 10 Laura Pfeifer laura.pfeifer@bakersterchi.com Baker Sterchi Cowden & Rice LLC 11 2100 Westlake Ave. N., Ste. 206 12 Seattle, WA 98109 main: 206-957-9669 13 fax: 206-352-7875 Attorneys for Defendant Hoblit Automotive, Inc., d/b/a Hoblit Chevrolet Buick GMC 14 15 Dated: October 22, 2024 Janice Hennessey 16 17 By: s/Janice Hennnessey JANICE HENNESSEY, Pro Se Litigant 18 Email: janicehennessey2015@gmail.com 855 Trosper Road SW, #108-157 19 Tumwater, WA 98512 20 Telephone: 415-676-8711 21 22 23 24 Janice Hennessey, Pro Se Plaintiff STIPULATED MOTION AND ORDER TO 25 855 Trosper Road SW, #108-157 EXTEND TIME TO REPLY TO Tumwater, WA 98512 DEFENDANTS' RESPONSE TO MOTION Tel. 415-676-8711 FOR RELIEF – NOTE ON MOTION

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